



IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
\$118,880.00 IN U.S. CURRENCY,)
)
Defendant.)
_____)

CASE NO. 21-cv-03873-CAP

VERIFIED CLAIM

BY BRUCE SMITH AND PRO D&B LOGISTICS, LLC

COMES NOW, the Claimants, BRUCE SMITH ("Smith") and PRO D&B LOGISTICS, LLC ("Pro D&B"), and assert their interest in the above styled defendant property, to wit \$118,880 in U.S. Currency ("Defendant Property"), and hereby contest the instant forfeiture. Pursuant to 18 U.S.C. 983(a)(4)(A) and Rules G(4) and G(5) of the *Supplemental Rules For Admiralty or Maritime Claims and Asset Forfeiture Actions*, Smith and Pro D&B state as follows:

1. Specific Property Being Claimed: \$118,880.00 in U.S. Currency
2. Identity of the Claimants: Bruce Smith and Pro D&B Logistics, LLC.

3. Claimants' Interest in the Property: Pro D&B claims an ownership interest in the Defendant Property. It was acquired from the operation of Pro D&B's trucking business and economic relief given to Pro D&B by the U.S. Government in response to the Coronavirus Pandemic.

Smith also asserts an ownership and possessory interest in the Defendant Property. He is an owner of Pro D&B and is also one of its corporate officers/authorized representatives. As an owner of Pro D&B, he has an ownership interest in the Defendant Property. Additionally, Smith possessed the Defendant Property at the time of seizure, on behalf of Pro D&B, for the purpose of purchasing a new truck for Pro D&B.

OATH UNDER PENALTY OF PERJURY

I declare under penalty of perjury, under the laws of the United States of America, that all of the foregoing is true and correct.

Signed,

DocuSigned by:
Bruce Smith
DE0C276317534E1...

11/16/2021

Date: _____

Bruce Smith
Personally and on Behalf of
Pro D&B Logistics, LLC

Wessels & Gerber, PC

DocuSigned by:
Sanford Gerber, Esq.
F4BC0820904F4CB...

Sanford Gerber, Esq.
Counsel Bruce Smith and
Pro D&B Logistics, LLC

Member GAMD
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of this document was served on the
following parties via CM/ECF on November 16, 2021.

SERVICE LIST

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